

EXHIBIT Y

1 **INTERROGATORY NO. 14:**

2 Identify all facts related to Your affirmative defense that Plaintiffs' claims are barred in
3 whole or in part by the doctrine of unclean hands.

4 **RESPONSE TO INTERROGATORY NO. 14:**

5 In addition to the General Objections set forth above, Zuffa objects to this Interrogatory as
6 premature to the extent it is a contention interrogatory that impermissibly seeks Zuffa's protected
7 work product.

8 **INTERROGATORY NO. 15:**

9 Identify all facts related to Your affirmative defense that Plaintiffs have either mitigated
10 their damages or failed to make reasonable efforts to mitigate their damages.

11 **RESPONSE TO INTERROGATORY NO. 15:**

12 In addition to the General Objections set forth above, Zuffa objects to this Interrogatory as
13 premature because it calls for Zuffa to opine about the theoretical economic effects of conduct
14 undertaken by third parties, which is more appropriately suited for expert discovery. Subject to
15 and without waiving its objections, Zuffa responds as follows:

- 16 1. Plaintiff Jon Fitch has mitigated any alleged damage resulting from Zuffa's alleged
17 unlawful conduct by contracting with a rival MMA promotion, the World Series of
18 Fighting (WSOF). Plaintiff Fitch has received several hundred thousand dollars in
19 compensation from WSOF. Plaintiff Fitch has also benefited from the notoriety gained by
20 his association with UFC by, for example, holding himself out on his personal website as
21 "among the best welterweights in mixed martial arts (MMA), reeling off a staggering
22 eight consecutive victories in the talent-rich Ultimate Fighting Championship (UFC) 170-
23 pound division from 2005 to 2008."
- 24 2. Plaintiff Brandon Vera has mitigated any alleged damage resulting from Zuffa's alleged
25 unlawful conduct by contracting with a rival MMA promotion, ONE Championship.
26 Plaintiff Vera has received several hundred thousand dollars in compensation from ONE
27 Championship. Plaintiff Vera has also benefited from the notoriety gained by his

1 association with the UFC by, for example, being held out on his event booking agent's
2 website as a UFC veteran with an "impressive 13-7 record."

3 3. Plaintiff Cung Le has failed to mitigate any alleged damage resulting from Zuffa's alleged
4 unlawful conduct by declining to seek any professional MMA opportunities following the
5 conclusion of his relationship with UFC. Plaintiff Le has also benefited from the notoriety
6 gained by his association with the UFC by, for example, pursuing a television and feature
7 film acting career that is in part due to his recognition as a former UFC fighter.

8 4. Plaintiff Kyle Kingsbury has failed to mitigate any alleged damage resulting from Zuffa's
9 alleged unlawful conduct by declining to seek any professional MMA opportunities
10 following the conclusion of his relationship with UFC.

11 5. Plaintiff Javier Vazquez has failed to mitigate any alleged damage resulting from Zuffa's
12 alleged unlawful conduct by declining to seek any professional MMA opportunities
13 following the conclusion of his relationship with UFC. Plaintiff Vazquez has also
14 benefited from the notoriety gained by his association with the UFC by, for example,
15 marketing his MMA gym as being "taught by Javier Vazquez, former WEC & UFC
16 Competitor."

17 6. Plaintiff Nathan Quarry has failed to mitigate any alleged damage resulting from Zuffa's
18 alleged unlawful conduct by declining to seek any professional MMA opportunities
19 following the conclusion of his relationship with UFC. Plaintiff Quarry has also benefited
20 from the notoriety gained by his association with the UFC by, for example, holding
21 himself out on his online apparel store—Zombie Cagefighting—as a former UFC title
22 contender.

23 **INTERROGATORY NO. 16:**

24 Identify all facts related to Your affirmative defense that Plaintiffs claims are barred in
25 whole or in part because any damages they suffered from the alleged conduct must be offset from
26 the benefits they received from the alleged conduct.

27 **RESPONSE TO INTERROGATORY NO. 16:**